

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON SCHMITT, TARA SCHMITT,
JAMES SCHMITT, and ANITA SCHMITT,

Defendants.

Civil Action No. 3:24-cv-214

**UNOPPOSED MOTION TO EXTEND TIME TO SERVE INITIAL DISCLOSURES AND
CONTINUE STATUS CONFERENCE**

Plaintiff United States of America respectfully requests the Court to extend by twenty-one days the June 3, 2025, deadline for the parties' initial disclosures and to continue the June 10, 2025, Telephonic Status Conference and reset the conference to a date on or after June 24, 2025.

Undersigned counsel of record for the United States has a merits oral argument in the U.S. Court of Appeals for the Fifth Circuit scheduled for June 3, 2025, which has required substantial time for intragovernmental coordination and preparation. Counsel also recently returned from an extended travel period. Accordingly, the United States requires additional time to prepare and provide its initial disclosures to Defendants, and to prepare for the Status Conference. Undersigned counsel of record for the United State has conferred with counsel for Defendants, who confirmed that Defendants consent to the relief requested in this motion.

In the event that the Court grants the relief requested in this motion, counsel for the Parties offer the Court the following dates on which they have preexisting commitments and are not available:

- June 24, 2025, before 9 a.m. CDT and from 12–12:30 p.m. CDT
- June 25, 2025

For these reasons, and because no party would be prejudiced by the requested extension and continuance, the Court should extend by twenty-one days the June 3, 2025, deadline for the parties' initial disclosures and continue the Telephonic Status Conference to a date on or after June 24, 2025.

Respectfully submitted,

/s/ Samuel B. Stratton
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Counsel for the United States

Dated: June 2, 2025

PROOF OF SERVICE BY ELECTRONIC SERVICE

I hereby certify that on June 2, 2025, I electronically filed the foregoing Unopposed Motion to Extend Time to Serve Initial Disclosures and Continue Status Conference using the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Samuel B. Stratton
SAMUEL B. STRATTON

Counsel for the United States